

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*On behalf of themselves and
Others similarly situated,*

Civ. Action No. 14-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
Successor-in-interest to
NFL Properties, Inc.,

Defendants.

FRED WILLIS' RESPONSE/OPPOSITION TO THE MOTION FOR INJUNCTIVE RELIEF

Fred Willis respectively denies any and all allegations contained in the within Motion for Injunctive Relief sought by Attorney Seeger.

1. HPN Concussion Management and HPN Neurologic do not have anything to do with the NFL Concussion Lawsuit. HPN Neurologic Inc. was formed in 2012 at the start of the rash of suicides by retired NFL players Junior Seau, Dave Duerson and Ray Easterling. It is a company that markets and distributes an FDA approved medical device HPN High Performance Neurofeedback around the world to mental health professionals. HPN Neurologic has a network of licensed mental health professionals around the United States to treat "pro bono" retired NFL Players with symptoms of Post-Concussion Syndrome. HPN Concussion Management Inc. is a private company formed for an approach to Brain Recovery and the Treatment of Concussion, built around Second Impact Syndrome (SIS)? Second impact syndrome (SIS) occurs when an athlete returns to sport too early after suffering from an initial concussion the athlete may receive only a minor blow to the head or a hit to the chest or back that snaps the head enough to have the brain rebound inside the skull.

These companies were founded 5 years ago, long before any settlement agreement as a commitment to embark on a career of research, treatment and working with retired NFL

players showing the symptoms of Post-Concussion Syndrome, TBI/CTE through self-funded research, treatment and Clinical Trial studies by raising awareness of traumatic brain injury (TBI) in general.

2. I am and always have been an advocate and voice for retired NFL players with post-concussion syndrome. I am a proud brain donor to the VA-BU-SLI Brain Bank, The Center for the Study of Traumatic Encephalopathy (CSTE) at Boston University School of Medicine (BUSM), CSTE Brain Donation Registry.
3. As an advocate and voice for retired NFL players, I have had extensive conversations with the BAP administrator on when will a player get a BAP exam to qualify for The NFL Concussion Lawsuit. I have had communications with retired NFL players as to what I have knowledge of to help educate all retired NFL players as to their options.
4. That this motion, if allowed, interferes with my right to conduct lawful business.
5. Attorney Seeger is using this Court as a weapon to intentionally interfere with my business contractual relationships.

WHEREFORE, I respectfully request that Attorney Seeger's Motion for Injunctive Relief be denied with prejudice.

Respectfully submitted,

Fred Willis

CERTIFICATE OF SERVICE

A copy of this document was served upon Plaintiff or upon Plaintiff's attorney at the following address: Christopher Seeger, Seeger Weiss LLP, 77 Water Street, New York, NY 10005 and Sol Weiss, Anapol Weiss, One Logan Square, 130 N. 18th St. Ste, 1600, Philadelphia, PA 19103 by ordinary U.S. Mail, postage pre-paid, this 1st day of March, 2017.

Fred Willis